

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:16-CR-131-O

MANDY MARIE TURNER
a/k/a/ "Amy WOOLDRIDGE" (03

FACTUAL RESUME

INFORMATION: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

PENALTY: \$5,000,000 fine - not less than 5 years imprisonment and not more than 40 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 4 years.

MAXIMUM PENALTY:

\$5,000,000 fine and not less than five (5) years nor more than forty (40) years imprisonment, plus a term of supervised release of not less than 4 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

~~In 2014 and 2015, Mandy Turner received ounce quantities of methamphetamine from various suppliers, often on consignment. On occasion, Mandy Turner worked together with Brian Gibbons, and others, in distributing methamphetamine to various customers in Texas and Oklahoma.~~ Other times, Mandy Turner distributed methamphetamine on her own. Mandy Turner also introduced others, such as Shawn Cropp, to her methamphetamine source-of-supply so that Shawn Cropp could begin receiving methamphetamine for further distribution. In this manner, Mandy Turner conspired with Brian Gibbons, Shawn Cropp, and others to possess with intent to distribute more than 50 grams of methamphetamine.

SIGNED this 25 day of May, 2016.


MANDY MARIE TURNER
Defendant


KARA CARRERAS
Counsel for Defendant